

Original signed 4-1-04

Ms. Laurie Allen  
Acting Director, Office of Protected Resources  
National Marine Fisheries Service - 13<sup>th</sup> floor  
1315 East-West Highway  
Silver Spring, MD 20910

Dear Ms. Allen:

The Office of Pesticide Programs (OPP), US Environmental Protection Agency (EPA) respectfully requests the initiation of Endangered Species Act (ESA) section 7(a)(2) consultation. This consultation request addresses nineteen (19) Evolutionarily Significant Units (ESUs) of Pacific salmon and steelhead that have been listed as Federally endangered or threatened, and one pesticide active ingredient registered by EPA under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), for uses within the range of the listed ESUs. The pesticide active ingredient subject to this request is methidathion which is a broad spectrum insecticide/acaricide pesticide registered for control of a wide range of sucking, leaf-eating, and scale insects. Methidathion is used on a variety of food and feed crops that include alfalfa (grown for seed), almonds, apples, apricots, artichokes, carambola, cherries, clover (grown for seed), cotton, grapefruit, hay-grass, kiwi fruit, lemons, longan, mandarins, mangos, nectarines, olives, oranges, peaches, pears, pecans, plums, prunes, safflower, sorghum, sugar apple, sunflower, timothy, and walnuts. Methidathion is primarily used in California. Our long-term intent is to make effects determinations and consult, as appropriate, relative to all listed species and locations. However, as per agreement with the National Marine Fisheries Service, this request is limited to Pacific salmon and steelhead for which NMFS has responsibility.

Methidathion has very high toxicity to fish and invertebrates in laboratory tests. However, based on the best available data on usage, environmental fate characteristics, the habitat for the individual ESU's and other information, OPP has determined that some methidathion uses may affect ten listed Pacific salmon and steelhead ESUs; may affect but are not likely to adversely affect nine listed Pacific salmon and steelhead ESUs; and methidathion use will have no effect on the remaining seven ESUs.

A summary table at the back of the attached analysis indicates the specific determinations made for each of the 26 ESUs. I am requesting formal consultation on our determination that use of methidathion may affect the following ESUs: Upper Columbia spring run, Snake river spring/summer run, Upper Willamette, and the Snake river fall run Chinook; Snake River Sockeye Salmon; Snake River basin, Upper Columbia River, Middle Columbia River, Upper Willamette River, and Central Valley California steelhead. I am requesting your concurrence, under the informal consultation process, on OPP's determination that the registered use of methidathion is not likely to adversely affect the following listed Pacific salmon and steelhead ESU's: Lower Columbia River, South-Central California, and Central California Coast

steelhead; Sacramento River winter-run, Central Valley spring-run, Lower Columbia River, and Puget Sound chinook salmon; Oregon Coast and Southern Oregon/Northern California Coast coho salmon. We are not requesting consultation on the remaining seven since we have determined that methidathion use will have no effect on those ESUs.

OPP is working toward a final endangered species program which is expected to be final within the next several months. We are developing county-specific bulletins to address pesticide use and endangered and threatened species. It is through such bulletins, and pesticide product label reference to them, that OPP intends to implement and enforce protections for listed species, including any necessary protections for listed salmon and steelhead.

I look forward to working with NMFS to protect and help recover listed species. If you have any questions, please feel free to contact me on (703) 305-5239, or your technical staff may contact Nikiba Daughtry, our review biologist, at (703) 305-6460.

enclosures

Sincerely,

Arthur-Jean B. Williams, Chief  
Environmental Field Branch  
Field and External Affairs Division (7506C)

cc: Craig Johnson